REMARKS

Claims 7-9, 13-15, 19-21, 25 and 27 stand rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent Application Publication No. 2002/0103932 to Bilbrey et al. Applicant respectfully traverses this rejection.

Applicant respectfully submits that the Bilbrey et al. reference fails to disclose message-address management processing that includes, *inter alia*, "determining, from a plurality of provided message address lists of message exchanging groups, a message address list including the old address of the member, and extracting message addresses of the rest of the members of the determined message address list, wherein the rest of the members includes members with message addresses that have not been changed," as defined in independent Claims 7 and 13. Applicant also respectfully submits that the Bilbrey et al. reference fails to disclose message-address management processing that includes, *inter alia*, "means for determining a server associated with each of the rest of the members of the determined message address list; means for specifying a server, or servers, to which the absence response information is to be provided, on the basis of the determined server or servers; and means for distributing the absence response information to the specified server or servers," as recited in independent Claim 19 (and as similarly recited in independent Claim 7).

In the present invention of Claims 7 and 13, when a message address of a member of a message exchanging group is changed, information that includes both the old address and the new address is obtained. Next, message address lists of a number of different

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message exchanging groups are reviewed to determine which of those message exchanging groups includes the old address of the member changing their address. Then, in those groups that include the member changing their address, the addresses of the rest of the members (including members whose addresses are not being changed) are extracted, and the server (or servers) of those members are provided with the information regarding the member's change of address. Thus, with the invention of independent Claims 7 and 13, the change of address information is provided to the most appropriate servers (those associated with other members of message exchanging groups that also include the member whose address is being changed), but mailing resources are not wasted because the change of address information is not provided to servers outside of any of the member's message exchanging groups.

In contrast, in the device of Bilbrey et al., as can be seen in Figure 1, a sponsor database sends its address list to a reconnection manager (RM) to determine if there have been any address changes, and the RM requests and receives change of address information ·from a network server. The RM compares the change of address list received from the network server with the sponsor's address list to determine if there are any matches. Then, if the process includes an optional approval step, the network server determines if the recipients on the list of matches have granted permission to provide the sponsor with address change information; the approved new mailbox addresses are provided to the RM, which, in turn, provides the sponsor with the approved new mailbox addresses. If the optional approval step is not included, the network provides all of the new mailbox addresses from the match list to the RM, which, in turn, provides the sponsor with the new mailbox addresses.

Thus, the process of Bilbrey et al. is different from that of independent Claims 7 and 13. For example, in Bilbrey et al., the process of extracting message addresses from the message address lists reviewed are different from those of Claims 7 and 13 because the lists that are reviewed for the old address are not message address lists of message exchanging groups (as defined in Claims 7 and 13), but are instead change of address lists (COA data or COA records) that merely include clients whose addresses have changed. *See e.g.*, Bilbrey et al. par. [0055]; Figure 1. Thus, the address lists of Bilbrey et al. does not satisfy the claimed message address lists from which there is an extraction of the message addresses of the rest of the members of the message address list, wherein the rest of the members includes members with message addresses that have not been changed, as defined in independent Claims 7 and 13. Accordingly, as all of the features of independent Claims 7 and 13 have not been disclosed in the Bilbrey et al. reference, Applicant respectfully requests the withdrawal of this §102(e) rejection of independent Claims 7 and 13 and associated dependent Claims 8, 9, 14, 15, and 25.

With regard to independent Claim 19, the Bilbrey et al. reference fails to disclose, *inter alia*, the claimed "member address lists of message exchanging groups" are the lists being reviewed to determine lists including the old address of the member whose address has been changed. Instead, in Bilbrey et al., the list being reviewed is only a list of recipients whose addresses have changed.

In addition, the Bilbrey et al. reference also fails to disclose a means for determining a server associated with each of the rest of the members of the determined

message address list; a means for specifying a server, or servers, to which the absence response information is to be provided, on the basis of the determined server or servers; and a means for distributing the absence response information to the specified server or servers, as defined in independent Claim 19. Instead, in the device of Bilbrey et al., the list reviewed by the RM is a list of recipients whose addresses have changed, and there is no means for determining the server associated with each of the recipients in the rest of the list so that the change of address information can be distributed to those servers. This is the case because the change of address information is only sent to the sponsor server that requested the COA information in the first place (or a portion of the COA information is sent, if some recipients have not approved of the requesting sponsor for receipt of the COA information), and not to all members of the COA list. In other words, in Bilbrey et al., there is no step of determining the server associated with each item in the list (i.e., each COA item), because the servers associated with each item are not notified of the change of address, only the sponsor server requesting the COA information is notified. Accordingly, for at least this reason, Applicant respectfully requests the withdrawal of this §102(e) rejection of independent Claim 19, and associated dependent Claims 20, 21 and 27. Similar features are also defined in independent Claim 7, and therefore, for these reasons, as well as for the reasons discussed earlier, Applicant respectfully requests the withdrawal of this §102(e) rejection of independent Claim 7 and associated dependent Claims 8, 9 and 25.

Claims 10, 11, 16, 17, 22 and 23 stand rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent Application Publication No. 2003/0135567 to

Reilly. Applicant has cancelled Claims 10, 11, 16, 17, 22 and 23, without prejudice, thereby rendering this rejection moot.
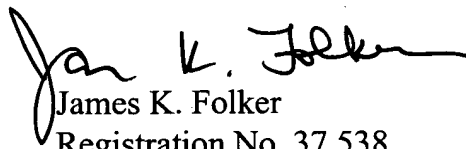
Claim 26 stands rejected a being obvious over the combination of Reilly and Bilbrey et al. Applicant respectfully traverses this rejection.

Claim 26 depends from independent Claim 13, and therefore includes all of the features of Claim 13, plus additional features. Accordingly, Applicants respectfully request that the §103 rejection of dependent Claim 26 be withdrawn considering the above remarks directed to independent Claim 13, and also because the Reilly reference does not remedy the deficiencies noted above, nor was it relied upon as such.

For all of the above reasons, Applicant requests reconsideration and allowance of the claimed invention. Should the Examiner be of the opinion that a telephone conference would aid in the prosecution of the application, or that outstanding issues exist, the Examiner is invited to contact the undersigned.

Respectfully submitted,

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